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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**WILLIAM JOHN LEE, et al.,**

Defendants.

**Case No. 18-CR-108-S**

**GOVERNMENT’S NOTICE OF INTENT TO OFFER EXPERT TESTIMONY**

The United States hereby submits its notice of intent to offer expert testimony, pursuant to Fed. R. Crim. P. 16(a)(1)(G), in the above-entitled matter as follows:

***Amber Peterson***

***Qualifications:*** Ms. Peterson is a Forensic Chemist with the Wyoming State Crime Laboratory, Cheyenne, Wyoming, and has been so employed since May 2014. Prior to coming to the Wyoming State Crime Laboratory, Ms. Peterson received a Bachelor of Science degree in Chemistry with a minor in Criminal Justice from Chadron State College, Chadron, Nebraska, in May 2005. After Ms. Peterson graduated from college, she worked for the Nebraska State Patrol in the satellite crime laboratory as a forensic scientist from May 2005, until March 2008. Ms. Petersons’ duties included the receipt, storage and disposition of evidence, as well as to prepare written reports of her findings and provide expert testimony. She was also responsible for

performing and assisting the laboratory through ASCLD-LAB procedures as well as training personnel in the analysis of controlled substances.

In March 2008, until November 2009, Ms. Peterson worked for the Kansas Bureau of Investigation Crime Laboratory. Ms. Peterson's responsibilities were similar to those in her prior position with the Nebraska State Patrol. After her employment with the Kansas Bureau of Investigation, Ms. Peterson was employed by the Wyoming Department of Health, Chemical Testing Program, Cheyenne, Wyoming, from December 2009, until January 2014. In this position, Ms. Peterson analyzed blood, urine and other biological specimens for the presence of controlled substances and alcohol; provided expert testimony; and trained individuals in the maintenance of the breath alcohol instruments.

In her current position, Ms. Peterson analyzes controlled substances, produces written reports of her analysis and provides expert advice and testimony. Additionally, Ms. Peterson performs routine and preventative maintenance on analytical instruments.

Ms. Peterson has been qualified as an expert in the field of forensic toxicology and forensic drug chemistry in Municipal and Circuit courts in the state of Wyoming.

Ms. Peterson's attached Curriculum Vitae more fully outlines her qualifications, experience and training. *See Exhibit 1.*

***Summary of Testimony:*** In her capacity as a Forensic Chemist at the Wyoming State Crime Laboratory, Ms. Peterson will testify she performed a chemical analysis on the suspected controlled substances seized in this case. Ms. Peterson will testify to the process and procedures she used in her analysis and will testify consistently to her results, opinions, and conclusions of this analysis as set forth in her laboratory report, which was previously provided in discovery.

***Sarah Barrett***

***Qualifications:*** Ms. Barrett is a Senior Forensic Analyst with the Wyoming State Crime Laboratory and has been so employed since March 2011. Since January 2018, Ms. Barrett has been assigned as the Chemistry Unit Technical Leader. Prior to becoming a Senior Forensic Scientist with the Wyoming State Crime Laboratory, Ms. Barrett was a Forensic Analyst with the Wyoming State Crime Laboratory from June 2007 until March 2011. In her current position, her duties are to analyze and identify suspected controlled substances, troubleshoot and maintain the GC/FID and GC/MS instruments, write reports, testify as an expert witness and respond to crime scenes state wide. While at crime scenes, Ms. Barrett sketches, photographs and collects evidence. Ms. Barrett's duties also include to develop and provide training programs for laboratory personnel in chemistry.

Ms. Barrett obtained a B.S. with honors in Chemistry in May 2007 from the University of Wyoming, Laramie campus. In addition to Ms. Barrett's graduate degree, she has received other professional development in the areas of court preparation and testimony, thermo scientific TruNarc analyzer training, troubleshooting and maintenance of equipment, synthetic drug workshop, training in hazards and handling of methamphetamine manufacturing (clan labs), and numerous other training. *See* attached Curriculum Vitae of Ms. Barrett, *Exhibit 2*.

Ms. Barrett has provided expert testimony in several Wyoming Judicial District Courts; in the United States District Court for the District of Wyoming; and at the General Court-Martial at F.E. Warren Air Force Base.

Ms. Barrett is a member of the American Chemical Society and the Clandestine Laboratory Investigating Chemists.

***Summary of Testimony:*** In her capacity as a Senior Forensic Analyst at the Wyoming State Crime Laboratory, Ms. Barrett will testify she performed a chemical analysis on the suspected controlled substances seized in this case. Ms. Barrett will testify to the process and procedures she used in her analysis and will testify consistently to her results, opinions and conclusions of this analysis as set forth in her laboratory report which was previously supplied in discovery.

***Amanda Heeren***

***Qualifications:*** Ms. Heeren is a Senior Forensic Analyst with the Wyoming State Crime Laboratory and been so employed since January 2014. Prior to becoming a Senior Forensic Analyst, Ms. Heeren was a Forensic Analyst with the Wyoming State Crime Laboratory from August 2011 until December 2013. In her current position, her duties include analyzing and identifying suspected controlled substances, troubleshooting and maintaining the GC/FID and GC/MS instruments, writing reports, testifying as an expert witness, responding to crime scenes statewide to sketch the crime scenes, photographing and collecting evidence, and developing and providing training programs for laboratory personnel in chemistry.

Ms. Heeren obtained an M.S. in Forensic Science from Marshall University in Huntington, West Virginia, in 2011, with emphases in forensic chemistry, crime scene investigation, and digital evidence. Ms. Heeren obtained a B.S. in Chemistry with a minor in biology in 2009 from South Dakota State University in Brookings, South Dakota. In addition to Ms. Heeren's graduate and post graduate degrees, she has received technical continuing education.

Prior to coming to the Wyoming State Crime Laboratory, Ms. Heeren was a research technician from May 2011 to August 2011. Her duties were to supervise graduate students' research projects and maintain the GC/MS instruments. From January 2011 to May 2011,

Ms. Heeren was a forensic chemistry teaching assistant at Marshall University. Her duties were to assist the professor in demonstrating main laboratory concepts in forensic chemistry. In addition, Ms. Heeren was a Forensic Chemistry Graduate Research Assistant at Marshall University from August 2009 to May 2011. Her duties were to perform research regarding competitive adsorption of specific ignitable liquids, as well as gasoline and kerosene individualization.

In addition to Ms. Heeren's education and employment history, Ms. Heeren has delivered presentations during the American Academy of Forensic Science conferences in Chicago, Illinois, and Atlanta, Georgia. Ms. Heeren has also been published in *Forensic Science International*. Ms. Heeren's Curriculum Vitae is attached to this pleading as *Exhibit 3*. Ms. Heeren has been qualified as an expert in federal and state courts in Wyoming.

***Summary of Testimony:*** Ms. Heeren will testify about her experience and training in the area of drug testing, and the procedures, equipment used, and the testing she conducted on some of the suspected controlled substances in this case. Specifically, Ms. Heeren will testify that she tested the items in this case and based on her testing, Ms. Heeren will testify that the items contained methamphetamine. Ms. Heeren will further testify as to the quantities and purity levels of the methamphetamine. The United States has previously produced Ms. Heeren's report concerning these (and other) tests to defense counsel in discovery.

***Joshua Williams***

***Qualifications:*** Mr. Williams is a Senior Forensic Scientist with the Wyoming State Crime Laboratory and has been so employed since May 2001. Prior to coming to the Wyoming State Crime Laboratory, Mr. Williams received a Bachelor of Science degree in Chemical Engineering and Petroleum Refining from the Colorado School of Mines in 1997. After

Mr. Williams graduated from college, Mr. Williams worked with the United States Peace Corps in Mariental, Namibia, Africa, from October 1997 to November 1999, where he was a secondary education economics and business studies teacher for grades 8 through 12. Mr. Williams' duties were to prepare and present lessons to 33 classes of 27 students each week, and prepare and grade homework, quizzes, and exams.

From November 1999 until January 2000, Mr. Williams worked with the United States Peace Corps in Okahandja, Namibia, Africa, where he was the Secondary Education Technical Training Coordinator. Mr. Williams' duties included planning and preparing sessions for 28 Peace Corps trainees to prepare them for teaching in Namibia. Mr. Williams also evaluated the trainees' performance and progress in order to recommend the trainees for swearing in as Peace Corps Volunteers.

From May 2000 until September 2000, Mr. Williams worked at the Colorado School of Mines in the Chemical Engineering Department at Golden, Colorado, as a laboratory technician. Mr. Williams then joined the Colorado Bureau of Investigation in October 2000 as an Insta Check Operator and worked in this position until January 2001. His duties were to conduct background checks for potential firearm buyers.

From November 2000 until February 2001, Mr. Williams interned with the Colorado Bureau of Investigation at the Forensic Chemistry Laboratory in Denver, Colorado. Mr. Williams' duties were to analyze drug standards by Gas Chromatography-Mass Spectroscopy (GC-MS) and maintain a library of mass spectra, prepare paint samples for Fourier Transform Infrared Spectroscopy (FTIR) analysis and observe identification procedures for marijuana, cocaine, heroin, and psilocybin.

After interning with the Colorado Bureau of Investigation, Mr. Williams was employed at Today's Office Staffing in Golden, Colorado, as a Bankruptcy Specialist.

Since his employment with the Wyoming State Crime Laboratory, Mr. Williams has received additional training in clandestine laboratory investigations with the Rocky Mountain High Intensity Drug Trafficking Area program, introduction to mass spectral interpretation, and GC-MS troubleshooting and maintenance from Agilent Technologies. He has received 40 hours of training in a forensic chemist seminar through the Drug Enforcement Administration and 40 hours in a crime scene investigation course through the Federal Bureau of Investigation, in addition to numerous other areas of training as more fully outlined in Mr. Williams' attached Curriculum Vitae, *Exhibit 4*.

In his present employment, Mr. Williams conducts forensic examination and identification of a variety of drugs and has experience using GC-MS, FT-IR and Scanning Electron Microscope/Energy Dispersive X-ray Analyzer (SEM-EDAX). In addition, Mr. Williams analyzes and identifies suspected controlled substances and clandestine laboratory samples, troubleshoots and maintains the Gas Chromatography-Flame Ionization Detector (GC-FID) and GC-MS instruments, writes reports, helps develop and write standard operating procedures for the chemistry unit, testifies as an expert witness, responds to crime scenes state wide, takes photographs, collects evidence, develops and provides training programs for laboratory personnel in chemistry, crime scene response, and in crime scene management for the Peace Officer Basic classes at the Wyoming Law Enforcement Academy.

In addition to Mr. Williams' degree in Chemical Engineering and Petroleum Refining, Mr. Williams obtained an M.S. in Quality Assurance from the California State University in Dominguez Hills, California.

From December 2010 until January 2014, Mr. Williams served as the safety officer at the Wyoming State Crime Laboratory. In this position, Mr. Williams was required to monitor and advise the administration regarding safety, health, and environmental issues.

Mr. Williams has been qualified as an expert in the testing and identification of a variety of drugs in district courts in several counties in Wyoming, as well as in the United States District Court for the District of Wyoming.

***Summary of Testimony:*** In his capacity as a Senior Forensic Analyst at the Wyoming State Crime Laboratory, Mr. Williams will testify he performed a chemical analysis on the suspected controlled substances seized in this case. Mr. Williams will testify to the process and procedures he used in his analysis and will testify consistently to his results, opinions and conclusions of this analysis as set forth in his laboratory report, which was previously supplied in discovery.

***Jessica Bridges***

***Qualifications:*** Jessica Bridges is a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and stationed in Cheyenne, Wyoming. SA Bridges will testify that she has been in law enforcement since 2011 and has received in excess of 2,000 hours of documented law enforcement training. Further qualifications for SA Bridges is set forth in her Statement of Qualifications attached as *Exhibit 5*.

SA Bridges received a Bachelor's degree in Psychology from the University of Maryland, Baltimore County in 2010. SA Bridges worked as a detective with the state of Maryland and was assigned to the Warrant Apprehension Task Force from November of 2011 to November of 2015. In June of 2014, SA Bridges was deputized with the United States Marshal's Service and assigned to the Capital Area Regional Fugitive Task Force. SA Bridges is a graduate of the Federal Law



Enforcement Training Center and the ATF National Academy. In 2016, SA Bridges was stationed to the Cheyenne, Wyoming, ATF Field Office.

***Summary of Testimony:*** SA Bridges will testify to her extensive training and experience regarding the identification, origin, and classification of firearms and ammunition under the provisions of the Federal firearms laws, including but not limited to issues related to the interstate nexus of firearms and ammunition. SA Bridges will further testify as to identification, location of manufacture and subsequent transportation of the firearm involved in the instant offense, including but not limited to, the fact the firearm involved in this case was not manufactured in Wyoming, and was therefore transported from another state into the State of Wyoming. Further, SA Bridges will testify consistent with her written report, which was previously provided in discovery.

***Ryan Cox***

***Qualifications:*** Ryan Cox has been a law enforcement officer since 1994. Ryan Cox is currently a Special Agent Team Leader (TL) Supervisor for Wyoming Division of Criminal Investigation's (DCI) Central Enforcement Team in Casper, Wyoming. TL Cox has been employed with DCI since 2005. Previously to TL Cox's employment with DCI, he was a peace officer in South Dakota and Wyoming.

TL Cox has training specific in the field of drug investigations, including: the Drug Enforcement Administration's two week Narcotics Investigators Course; the Wyoming Division of Criminal Investigation one week Drug Investigation Course; the Drug Recognition Expert Course; the Recognizing Drug Impaired Driving Course; the Methamphetamine on Interstate Highways Course; the Clandestine Laboratory Safety Course. Additionally, TL Cox received training from the South Dakota Reserve Officer Certification Course; the South Dakota Peace

Officer's Certification Course; the Wyoming Peace Officer's Course; and the Wyoming Methamphetamine Awareness Conferences in addition to numerous other areas of training as more fully outlined in TL Cox's attached Curriculum Vitae. *See Exhibit 6.*

TL Cox is a member of the National Technical Investigators Association and in such capacity has attended training and taught instruction specific to drug related technological investigations. TL Cox has conducted instruction for civilians and law enforcement personnel on drug related subject matters.

***Summary of Testimony:*** TL Cox will be presented as an education witness, that is, he will not address facts specific to the charged case but instead will educate the jury regarding the generalities of drug trafficking. For instance, TL Cox is expected to testify that methamphetamine is not commonly made in the United States and how, therefore, most methamphetamine originates in Mexico and is transported into the smaller communities of Wyoming from specific "source cities" to include Denver, Colorado, and Salt Lake City, Utah. TL Cox is also expected to testify regarding the relationship between couriers, suppliers, and receivers of controlled substances, analogizing the distribution to that of a large retail chain. TL Cox may testify regarding the slang or street terminology of drug dealers and users, methods of speaking, texting or messaging designed to keep their true intent covert, methods of drug ingestion and the methodology of drug transactions.

TL Cox is expected to testify about items commonly used to consume, weigh and package controlled substances, which might not otherwise be known or noted by a person unfamiliar with drug consumption or trafficking. As an example, a person unfamiliar with drug consumption or trafficking may not otherwise note the significance of finding syringes and a hand-held torch near an area used for drug consumption.

TL Cox is also expected to testify that controlled substances may be sold on a cash or a “front” basis. When sold on a “front,” TL Cox will testify that the traffickers give controlled substances to others without an exchange of cash in anticipation of payment when the receiving individual has re-sold the controlled substances for a profit. TL Cox may also testify as to the local purchase and selling prices of controlled substances, and the typical quantities used for personal consumption versus distribution.

TL Cox is expected to testify that drug users often engage in drug trafficking to support their addiction; that drug users/traffickers will often purchase a larger quantity of drugs, use some of the substance and sell some of the substance to recoup their costs or make additional money to buy more drugs. This is important for the fact finder to hear, as it can seem antithetical to hear that those trafficking in drugs can have thousands of dollars to spend on drugs, can be found in possession of thousands of dollars, and yet can be shown to be living in near-poverty conditions. TL Cox will also testify that controlled substances can be purchased in source cities or source areas for substantially reduced prices.

TL Cox will testify generally about the use and possession of firearms by individuals involved in the distribution of controlled substances, including firearms used as collateral being traded for controlled substances, for personal protection from others during the course of drug distribution, for intimidation of others, and for protection of controlled substances being held by individuals possessing large quantities of controlled substances.

***Matthew Wright***

***Qualifications:*** Matthew Wright is a Special Agent with the Bureau of Alcohol, Tobacco and Firearms (ATF) stationed in Cheyenne, Wyoming, and has been so employed since 2013. Prior to being employed with ATF, SA Wright was a platoon leader and operations officer with

the United States Army's 3<sup>rd</sup> Infantry Division. During SA Wright's service with the United States Army, he achieved the rank of Captain before transfer to the United States Army Reserve where he served an additional four years. During SA Wright's military career, SA Wright had extensive training in weapons assigned to his military unit. These weapons included: M4 Rifle; M240 Machine Gun; M249 Squad Automatic Rifle; M203, M320, MK19; Grenade Launchers; M210 Sniper Rifle; and M9 Pistol.

In 2012, SA Wright joined ATF and was employed as an Industry Operations Investigator. In 2013, SA Wright became a Special Agent with ATF. When first employed by ATF, SA Wright attended training with the ATF National Academy in Glynco, Georgia, as more fully set forth in his "Statement of Qualifications" attached as *Exhibit 7*.

SA Wright's duties and responsibilities in his current position as a special agent include: conducting investigations of federal firearm laws; examining firearms and ammunitions for the purpose of determining the place of manufacture; the function and design, as well as the manufacturer, model and caliber/gauge.

***Summary of Testimony:*** SA Wright will testify to his extensive training and experience regarding the identification, origin, and classification of firearms and ammunition under the provisions of the federal firearms laws, including but not limited to issues related to the interstate nexus of firearms and ammunition. SA Wright will further testify as to identification, location of manufacture and subsequent transportation of the firearms involved in the instant offense, including but not limited to, the fact the firearms involved in this case were not manufactured in Wyoming, and therefore, they were transported from another state into the State of Wyoming.

***Ryan Hieb***

***Qualifications:*** Ryan Hieb is a Special Agent with the Wyoming Division of Criminal Investigation (DCI), stationed in the Casper, Wyoming, field office and has been so employed since 2016. Prior to his employment with DCI, SA Hieb graduated from Casper College with an Associate of Arts in Criminal Justice and an Associate of Applied Science in Science Technology, Summa Cum Laude, with distinction, in 2008. In 2010, SA Hieb graduated with a Bachelor of Arts in Justice Studies with an emphasis on law enforcement, Summa Cum Laude, with distinction. From 2009 to 2010, SA Hieb studied abroad in London, England, with the London Metropolitan Police at New Scotland Yard where he earned six undergraduate and six graduate credits. From 2010 to 2016, SA Hieb was employed as a Police Officer, a Problem Oriented Response Team (PORT) Officer and an Operations Support Team (OST) Detective with the Casper Police Department, Casper, Wyoming. In 2015, SA Hieb while still being employed with the Casper Police Department, worked as a Task Force Officer for DCI until 2016. In 2016, SA Hieb received his Masters of Science in Organizational Management, Summa Cum Laude, with distinction, from Chadron State College, Chadron, Nebraska.

SA Hieb has numerous computer related certifications as well other certifications in the area of law enforcement. Additional qualifications, training and experience for SA Hieb are further outlined in his Curriculum Vitae attached as *Exhibit 8*.

SA Hieb's duties and responsibilities as a DCI Special Agent are: conducting state and federal investigations related to technology-facilitated crimes; conducting certified computer forensic examinations on computers, computer equipment, digital media, digital cameras, cellular phones, and all peripherals involved in Internet Crimes Against Children and Narcotics

Trafficking; serving arrest warrants, executing search warrants; and developing criminal cases for presentation before the courts in state and federal venues.

***Summary of Testimony:*** SA Hieb will provide percipient and opinion testimony as to the forensic downloads and extraction of digital information from cellular telephones seized during the investigation of this case. SA Hieb will testify regarding the investigation, preservation, and retrieval of digital information from the cellular telephones seized. SA Hieb will testify regarding the procedures used to preserve the data contained on the seized cellular telephones, the process of extraction of the data from the cellular phones using specific software, and the analysis of the cellular telephones. SA Hieb will testify to the opinions and conclusions reached based on the investigation. Specifically, SA Hieb will set forth the findings of the forensic examinations of the cellular telephones and the various files that were discovered during the examinations, and will render an opinion consistently with reports and downloads that have been provided in discovery.

It can be difficult to distinguish whether opinion testimony is truly “expert” testimony under Federal Rules of Evidence, Rule 702, or whether it is opinion testimony as provided by a lay witness under Rule 701. Thus, while some types of opinions referenced herein are arguably either 701 or 702 material, the United States provides this notice out of an abundance of caution.

The United States reserves the right to supplement this notice of expert witness testimony pursuant to the continuing duty to disclose. Rule 16(c), Federal Rules of Evidence.

**DATED** this 17<sup>th</sup> day of September, 2018.

Respectfully submitted,

MARK A. KLAASSEN  
United States Attorney

By: /s/Trevor J. Schenk  
TREVOR J. SCHENK  
Assistant United States Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that on the 17<sup>th</sup> day of September, 2018, a true and correct copy of the foregoing **Government's Notice of Intent to Offer Expert Testimony** was served upon counsel of record via CM/ECF or the Court's Electronic Filing System.

/s/ Lisa Wait  
UNITED STATES ATTORNEY'S OFFICE

**EXHIBIT 1****Amber Peterson**

Phone: 307-777-3692

E-mail: amber.peterson1@wyo.gov

DCI Crime Laboratory

208 South College Drive

Cheyenne, WY 82002

**Education**

Bachelor of Science in Chemistry with a minor in Criminal Justice from Chadron State College, May 2005

Graduated *magna cum laude***Experience****Wyoming Division of Criminal Investigation Crime Laboratory**

Cheyenne, WY

*Forensic Chemist, February 2014-Present*

Analysis of controlled substances

Maintain written reports on analysis

Provide expert advice and testimony

Perform routine and preventative maintenance on analytical instruments

**Wyoming Department of Health Chemical Testing Program**

Cheyenne, WY

*Forensic Toxicologist, December 2009– January 2014*

Analysis of blood, urine, and other biological specimens for presence of controlled substances and alcohol

Provide expert witness testimony

Trained in breath alcohol instrument maintenance with Intoximeters and Alcosensor IV instruments

Provide training to statewide agencies in regards to Wyoming Chemical Testing Program

**Kansas Bureau of Investigation Crime Laboratory**

Topeka, KS

*Forensic Scientist, March 2008– November 2009*

Analysis of controlled substances

Prepare written reports and provide expert witness testimony

Perform and assist laboratory through ASCLD-LAB procedures

Receipt, storage and deposition of evidence

**Nebraska State Patrol– Satellite Crime Laboratory**

North Platte, NE

*Forensic Scientist, May 2005– March 2008*

Analysis of controlled substances

Receipt, storage, and disposition of evidence

Prepare written reports and provide expert witness testimony

Perform and assist laboratory through ASCLD-LAB procedures

Trained personnel in controlled substance analysis

**Court Experience**

Accepted as an expert in the fields of:

Forensic Toxicology

Forensic Drug Chemistry

Accepted as an Expert Witness in:

Municipal and Circuit courts in Wyoming

**Specialized Training**

DEA Forensic Chemist Seminar

*Dulles, VA June 2017*

Wyoming State Crime Laboratory Pharmaceuticals Training

*Cheyenne, WY December 2015 to November 2016*

Fundamentals of Crime Scene Photography

*Cheyenne, WY June 2015*



Court Preparation and Testimony Training

*Cheyenne, WY June 2015*

FTIR Training

*Denver, CO May 2015*

Restek GC/MS Training

*Denver, CO September 2014*

Hash Oils Hazards Class

*Cheyenne, WY September 2014*

TruNarc Training

*Cheyenne, WY August 2014*

Wyoming State Crime Laboratory Basic Powders and Analysis Training

*Cheyenne, WY June 2014 to May 2015*

RMHIDTA Spice and Bath Salts

*Cheyenne, WY June 2014*

RMDIAI Crime Scene Investigation Back to Basics

*Commerce City, CO April 2014*

WLEA Crime Scene Management Class

*Douglas, Wyoming March 2014*

Wyoming State Crime Laboratory Marijuana Analysis Training

*Cheyenne, Wyoming Feb 2014-May 2014*

Governor's Council Conference on Impaired Driving

*Laramie, Wyoming May 2013*

Forensic Toxicology Symposium

*Ames, Iowa Jan 2011*

Robert F. Borkenstein Course on Alcohol and Highway Safety: Testing, Research and Litigation

*Bloomington, IN April 2010*

Wyoming Department of Health Chemical Testing Program Controlled Substance and Alcohol Analysis Training

*Cheyenne, WY December 2009– March 2010*

Basic Forensic Toxicology Course

*Wichita, KS March 2010*

Clandestine Laboratory Investigating Chemists (CLIC) Seminar

*San Antonio, TX September 2008*

Agilent GC/MS Training

*Kansas City, MO June 2008*

Kansas Bureau of Investigation Crime Laboratory Controlled Substance Analysis Training

*Topeka, KS March 2008– May 2008*

Midwestern Association of Forensic Scientists Drug Symposium

*Ames, IA May 2007*

Forensic Mass Spectrometry Course

*FBI Training Academy Quantico, VA April 2007*

Midwestern Association of Forensic Scientists Basic Drug Identification Workshop

*Overland Park, KS May 2006*

Nebraska State Patrol Crime Laboratory Controlled Substance Analysis Training

*North Platte, NE May 2005– August 2005*

### **Professional Organizations**

Southwestern Association of Forensic Scientists *March 2007-Present*

### **Scientific Research**

Methamphetamine Production Using Ethylenediamine Dihydroiodide and Sodium Iodide

*Research Associate with KBI Laboratory Great Bend, KS February 2009*

*(Topic presented at September 2009 Clandestine Laboratory Investigating Chemists Seminar in Birmingham, AL)*

**SARAH E. BARRETT**

208 South College Drive, Cheyenne, WY 82007  
 (307) 777-5865  
 Sarah.Barrett@wyo.gov

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**EDUCATION**

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*University of Wyoming, Laramie, WY*

**B.S. in Chemistry and Honors Program, May 2007**

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**EXPERIENCE**

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*Wyoming State Crime Laboratory, June 2007-Present*

**Chemistry Unit Technical Leader, January 2018-Present**

**Senior Forensic Analyst, March 2011-Present**

**Forensic Scientist, June 2007-March 2011**

Duties include analysis of suspected controlled substances including cannabinoids, basic powders, pharmaceuticals, and hallucinogens. Analysis includes presumptive and confirmatory testing utilizing Gas Chromatograph-Flame Ionization Detector (GC-FID), Gas Chromatograph-Mass Spectrometer (GC-MS), and Fourier Transform-Infrared Spectrometer (FT-IR). Responsibilities also include preparing reports based on examination findings, testifying in regard to analyzed items, performing routine maintenance on instrumentation and reviewing other analysts' work. Technical Leader responsibilities include managing the technical training program, preparing and verifying reagents for presumptive testing, writing and revising Chemistry Technical Standard Operating Procedures, and maintaining documentation for technical elements of the Chemistry Unit.

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**PROFESSIONAL DEVELOPMENT**

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- **Clandestine Laboratory Investigation Chemists Association.** Technical Training Seminar. Charleston, SC. September 2016
- **Clandestine Laboratory Investigating Chemists Association.** Sharpening the Saw: Refreshing Knowledge in Clan Lab Investigations and Basic Chemistry Concepts. Charleston, SC. September 2016
- **Rocky Mountain High Intensity Drug Trafficking Area.** Clandestine Laboratory Safety Certification. Parker, CO. September-October 2015
- **Clandestine Laboratory Investigating Chemists Association.** Technical Training Seminar. Oklahoma City, OK. September 2015
- **Regional Information Sharing Systems.** Court Preparation and Testimony. Cheyenne, WY. June 2015
- **Thermo Scientific,** Thermo Scientific TruNarc Analyzer Training Course. Cheyenne, WY. August 2014
- **Agilent Technologies,** Agilent GC/MSD Troubleshooting and Maintenance. Alpharetta, GA. July 2014
- **National Institute of Standards and Technology, Drug Enforcement Administration.** Emerging Trends in Synthetic Drugs Workshop and Webcast. Cheyenne, WY. April-May 2013
- **Midwest Counterdrug Training Center.** One Pot Meth Cooks: Hazards and Handling. Cheyenne, WY. May 2012
- **Wyoming State Crime Laboratory.** Synthesis of Methamphetamine Training. Cheyenne, WY. October 2010
- **Midwestern Association of Forensic Scientists.** The Chemistry of Clan Labs. Kansas City, MO. October 2010

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- **Midwestern Association of Forensic Scientists.** Mass Spectral Interpretation of Unknowns. Kansas City, MO. October 2010
  - **Southwestern Association of Forensic Scientists.** Comparison of GC-MS and GC-IRD Methods for the Identification of Isomeric Substituted Phenethylamine and Related Drug Substances. Dallas, TX. September 2010
  - **Southwestern Association of Forensic Scientists** Drug Drugs, Analogs, and Controlled Substance Analogs. Dallas, TX. September 2010
  - **Southwestern Association of Forensic Scientists** Current JWH Compounds. Dallas, TX. September 2010
  - **Wyoming State Crime Laboratory.** In-house Hallucinogens Training. Cheyenne, WY. September 2009
  - **Northwest Association of Forensic Scientists Conference.** Instrumental Theory. Fort Collins, CO, September 2009
  - **Drug Enforcement Administration.** Forensic Chemists Seminar. Sterling, VA. June 2009
  - **Wyoming State Crime Laboratory.** In-house Pharmaceutical Training. Cheyenne, WY. September 2008
  - **Wyoming Criminal Justice Association.** Conference. Cheyenne, WY. September 2008
  - **Federal Bureau of Investigation Academy.** Forensic Mass Spectrometry. Quantico, VA. April 2008
  - **Wyoming State Crime Laboratory.** In-house Basic Powders Training. Cheyenne, WY. March 2008
  - **Specialized Training Services.** Testifying in Court. Denver, CO. November 2007
  - **Wyoming State Crime Laboratory.** In-house Marihuana and Tetrahydrocannabinol Identification Training. Cheyenne, WY. September 2007
  - **Wyoming Law Enforcement Academy.** Crime Scene Training. Douglas, WY. July 2007

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#### EXPERT WITNESS TESTIMONY

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- Wyoming Judicial Districts: Second, Third, Fourth, Fifth, Sixth, Seventh, Eighth, and Ninth Districts
- United States District Court: District of Wyoming
- General Court-Martial: F.E. Warren AFB

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#### MEMBERSHIPS

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- American Chemical Society
- Clandestine Laboratory Investigating Chemists Association

## EXHIBIT 3

### AMANDA HEEREN

208 South College Drive, Cheyenne, WY 82002

(307) 777-7699

amanda.heeren@wyo.gov

#### Experience

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**Senior Forensic Analyst**, January 2014-present

**Forensic Analyst**, August 2011-December 2013

**Division of Criminal Investigation, Crime Laboratory**-Cheyenne, WY

Analyze and identify suspected controlled substances, troubleshoot and maintain GC/FID and GC/MS instruments, write reports, testify as an expert witness, develop and provide training programs for laboratory personnel in chemistry.

#### Education

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**Masters of Science in Forensic Science**, 2011

Marshall University, Huntington, WV

Emphases: Forensic Chemistry, Crime Scene Investigation, Digital Evidence

**Bachelors of Science in Chemistry, Minor in Biology**, 2009

South Dakota State University, Brookings, SD

#### Presentations

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Heeren, A., Rankin, J.G. Effects of Competitive Adsorption on Interpretation of Ignitable Liquid Residues in Fire Debris Analysis. Poster presented at: American Academy of Forensic Science 63rd Annual Conference; 2011 Feb 25; Chicago, IL.

Rehme, J., Heeren, A., Rankin, J.G. Development and Validation of a Quantitative Method for Identification of Synthetic Cannabinoids Using GC/MS. Poster session presented at: American Academy of Forensic Science 64<sup>th</sup> Annual Conference; 2012 Feb 24; Atlanta, GA.

Wilbur, K.A., Heeren, A., Rankin, J.G. Target Compound Ratio Analysis of Medium Petroleum Distillates. Poster session presented at: American Academy of Forensic Science 64th Annual Conference; 2012 Feb 24; Atlanta, GA.

Vititoe, J., Heeren, A., Rankin, J.G. Effects of Various Substrate Types on E1618 Patter Classification of Ignitable Liquids Present in Fire Debris. Poster session presented at: American Academy of Forensic Science 64th Annual Conference; 2012 Feb 24; Atlanta, GA.

#### Publications

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Lu, W.J., Rankin, G., Bondra, A., Trader, C., Heeren, A., Harrington, P.B. Ignitable liquid identification using gas chromatography/mass spectrometry data by projected difference resolution mapping and fuzzy rule-building expert system classification. *Forensic Science International* 2012; 220:210-218.

#### Professional Memberships

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**American Academy of Forensic Science**

Student Affiliate, February 2011-December 2011

**International Homicide Investigators Association**

June 2012-June 2013

**Clan Lab Investigating Chemists**

September 2014-present

## **Technical Continuing Education**

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**Crime Scene Management**, November 3-4, 2011

Wyoming Law Enforcement Academy- Douglas, WY

**THC Extraction and Food Stuff Preparation**, March 2, 2012

Denver Police Department-Denver, Colorado

**International Homicide Investigators Association**, April 30-May 4, 2012

Wyoming State Crime Lab-Cheyenne, WY

**One Pot Meth Cooks: Hazards and Handling**, May 30, 2012

Wyoming State Crime Lab-Cheyenne, WY

**Bloodstain Documentation for the First Responder**, March 22, 2013

Wyoming State Crime Lab-Cheyenne, WY

**Emerging Trends in Synthetic Drugs Workshop and Webcast**, April 30-May1, 2013

Wyoming State Crime Lab-Cheyenne, WY

**Advanced Techniques for Unresolved Death Investigations**, July 8-12, 2013

Wyoming State Crime Lab-Cheyenne, WY

**DEA Forensic Chemist Seminar**, March 9-14, 2014

DEA Special Testing and Research Laboratory-Dulles, VA

**TruNarc TN-Chemical Identification System**, August 4, 2014

Wyoming State Crime Lab-Cheyenne, WY

**Court Preparation and Testimony**, June 4-5, 2015

Wyoming State Crime Lab-Cheyenne, WY

**Fundamentals of Crime Scene Photography**, July 22-25, 2015

Wyoming State Crime Lab-Cheyenne, WY

**Clandestine Laboratory Investigating Chemists Association**, September 9-12, 2015

Oklahoma City, Oklahoma

**RMHIDTA Clandestine Laboratory Certification**, September 28-October 2, 2015

Parker, Colorado

**Sharpening the Saw: refreshing Knowledge in Clan Lab Investigations and Basic Chemistry**

**Concepts**, September 6, 2016

Charleston, South Carolina

**Clandestine Laboratory Investigating Chemist Association**, September 7-10, 2016

Charleston, South Carolina

**Office of Traffic Safety Grant Funded Toxicology Method Development and Validation Workshop**,

July 27-28, 2017, Rancho Cordova, California

## **Testimony**

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**Carbon County Circuit Court, WY**  
**Johnson County Circuit Court, WY**  
**Laramie Municipal Court, WY**  
**Rawlins Municipal Court, WY**  
**Campbell County District Court, WY**  
**Natrona County District Court, WY**  
**Fremont County District Court, WY (Lander)**  
**US District of Wyoming, Casper, WY**  
**Hot Springs Circuit Court, Thermopolis, WY**  
**Campbell County Circuit Court, Gillette, WY**

## EXHIBIT 4

### *Joshua S. Williams*

#### **EMPLOYMENT**

Wyoming Division of Criminal Investigation, Crime Laboratory, Cheyenne, Wyoming

Sr. Forensic Analyst/Law Enforcement Analyst 1/Chemistry

Feb 2005 – present

Law Enforcement Analyst 2/Chemistry

June 2002 - Jan 2005

Law Enforcement Analyst 3/Chemistry

May 2001 - May 2002

Analyze and identify suspected controlled substances and clandestine laboratory samples, troubleshoot and maintain GC/FID and GC/MS instruments, write reports, help develop and write standard operating procedures for the chemistry unit, testify as an expert witness, respond to crime scenes state wide to sketch, photograph and collect evidence, develop and provide training programs for laboratory personnel in chemistry and crime scene response, provide training in crime scene management for the Peace Officer Basic classes at the WLEA.

Safety Officer

Dec 2010-Jan 2014

Monitor and advise the administration regarding safety, health, and environmental issues as chair of the safety committee and a member of the laboratory's Key Management.

Today's Office Staffing, Golden, Colorado

Feb 2001 – Apr 2001

Temporary Employee, Bankruptcy Specialist for GMAC. Processed bankruptcy information on GMAC customers.

Colorado Bureau of Investigation, Forensic Chemistry Laboratory, Denver, Colorado

Nov 2000 – Feb 2001

Intern, 12 hours/week. Analyzed drug standards by GC/MS and maintained a library of mass spectra, prepared paint samples for FTIR analysis, observed identification procedures for marijuana, cocaine, heroin, and psilocin.

Colorado Bureau of Investigation, Denver, Colorado

Oct 2000 – Jan 2001

Insta Check Operator. Conducted instant background checks on potential firearm buyers.

Colorado School of Mines, Chemical Engineering Department, Golden, Colorado

May 2000 – Sept 2000

Laboratory Technician. Prepared polymer solutions, measured dn/dc, collected light scattering data to determine fundamental properties of poly(lactic acid), a non-conventional, corn-based polymer.

US Peace Corps/Namibia, Okahandja, Namibia, Africa

Nov 1999 – Jan 2000

Secondary Education Technical Training Coordinator. Planned and presented sessions to 28 Peace Corps Trainees to prepare them for teaching in Namibia. Evaluated trainees' performance and progress in order to recommend trainees for swearing in as Peace Corps Volunteers.

US Peace Corps, Mariental, Namibia, Africa

Oct 1997 – Nov 1999

Secondary Education Economics and Business Studies Teacher, grades 8, 10, 11, and 12. Prepared and presented lessons to 33 classes of 27 students each week, prepared and graded homework, quizzes, and exams.

Colorado School of Mines, Chemical Engineering Department, Golden, Colorado

May 1996 – June 1997

Undergraduate Research Assistant. Operated differential scanning equipment to determine temperature dependence of degradation of recycled versus virgin polymers, prepared and molded polymer samples and measured samples' rheometric properties.

#### **EDUCATION**

Colorado School of Mines

Golden, Colorado

Degree: BS in Chemical Engineering and Petroleum Refining – May 1997

GPA: 3.8/4.0 cumulative

Minor: Public Affairs (McBride Honors Program)

Recipient of the Harrison L. Hayes Award for Scholarship, Personality, and Integrity

California State University, Dominguez Hills

Web-Based

Quality Assurance 2009-2015

Joshua S. Williams

11-30-2017

1 of 5

***IN-HOUSE TRAINING***

Chemistry: Marijuana, Basic Powders, Pharmaceuticals, Hallucinogens, Clandestine Laboratories

***CONTINUING EDUCATION***

<u>Rocky Mountain High Intensity Drug Trafficking Area</u> Clandestine Laboratory Investigations	October 2001 40 hours
<u>Agilent Technologies</u> Introduction to Mass Spectral Interpretation Introduction to Mass Spectral Interpretation II	May 2002 8 hours 8 hours
<u>Agilent Technologies</u> GC/MSD Troubleshooting and Maintenance	February 2003 24 hours
<u>Kevin M. Patrick, Utah State Crime Lab</u> Bloodstain Pattern Analysis Workshop	December 2003 40 hours
<u>Drug Enforcement Administration</u> Forensic Chemist Seminar	December 2003 40 hours
<u>Public Agency Training Council</u> Fingerprints	December 2003 16 hours
<u>Agilent Technologies e-seminars</u> Installation, Care and Maintenance of Capillary GC Columns GC Method Development	February 2004 1 hour 1.5 hours
<u>Federal Bureau of Investigation Training School</u> Crime Scene Investigation Course	May 2004 40 hours
<u>Agilent Technologies</u> LC/MS Seminar	March 2005 8 hours
<u>American Chemical Society</u> Chemistry of Marijuana of Humans	September 2005 2 hours
<u>Rocky Mountain High Intensity Drug Trafficking Area</u> Clandestine Laboratory Investigations Recertification	October 2005 8 hours
<u>Division of Criminal Investigation in-service training</u> Courtroom Testimony	January 2006 16 hours
<u>Federal Bureau of Investigation Laboratory Division</u> Laboratory Analysis of Fire Debris Course	March 2006 36 hours
<u>Agilent Technologies e-seminars</u> The Secrets of EPC in GC and GC/MS Operations	August 2006 1.5 hours
<u>Federal Bureau of Investigation</u> Police Photography In-Service	September 2006 74 hours



*CONTINUING EDUCATION (continued)*

<u>NWAFS/SWAFS Joint Conference</u> IR Interpretation and Forensic Applications	November 2006 8 hours
<u>Federal Bureau of Investigation Training School</u> Intermediate Crime Scene Processing-Explosives, IEDs Hazmat/WMDs, Shooting Trajectory, General Processing, Blood Spatter	May 2007 16 hours
<u>Rocky Mountain High Intensity Drug Trafficking Area</u> Clandestine Laboratory Investigations Recertification	July 2007 8 hours
<u>Clandestine Laboratory Investigating Chemists Association</u> Analysis of Tryptamine and Phenethylamine Analogs 17 <sup>th</sup> Annual Technical Training Seminar	September 2007 8 hours 24 hours
<u>Specialized Training Services, Inc</u> Testifying in Court	November 2007 14 hours
<u>American Society of Crime Laboratory Directors/Laboratory Accreditation Board (ASCLD/LAB)</u> Introduction to ISO/IEC 17025:2005	March 2008 8 hours
<u>ASCLD/LAB</u> ASCLD/LAB-International Assessor Training Course	March 2008 28 hours
<u>Association of Forensic Quality Assurance Managers (AFQAM)</u> Uncertainty of Measurement; ISO 17025 Assessments	June 2008 16 hours
<u>Rocky Mountain High Intensity Drug Trafficking Area</u> Clandestine Laboratory Investigations Recertification	July 2008 8 hours
<u>RTI International</u> To Hell and Back: The Ethics of Stewardship and the Stewardship of Ethics	December 2008 1 hour
<u>RTI International</u> Introduction to Uncertainty in Forensic Chemistry and Toxicology Parts I, II and III	Feb/March 2009 3 hours
<u>RTI International</u> Answering the NAS: The Ethics of Leadership and the Leadership of Ethics	July 2009 1 hour
<u>Rocky Mountain High Intensity Drug Trafficking Area</u> Clandestine Laboratory Investigations Recertification	July 2009 8 hours
<u>Clandestine Laboratory Investigating Chemists Association</u> Methamphetamine Synthesis Workshop 19 <sup>th</sup> Annual Technical Training Seminar	September 2009 8 hours 24 hours
<u>Northwest Association of Forensic Scientists-Fall Conference</u> Instrumental Theory	September 2009 32 hours
<u>Midwestern Association of Forensic Scientists 39<sup>th</sup> Annual Meeting</u> Crime Scene Symposium	October 2010 24 hours
<u>ASCLD/LAB</u> ASCLD/LAB-Technical Assessor Refresher Training	March 2012 1 hour

***CONTINUING EDUCATION (continued)***

<u>Midwest Counterdrug Training Center</u> One Pot Meth Cooks: Hazards and Handling	May 2012 8 hours
<u>NIST &amp; DEA</u> Emerging Trends in Synthetic Drugs Workshop & Webcast	April 2013 16 hours
<u>Clandestine Laboratory Investigating Chemists Association</u> Introduction to Pharmacology Workshop 23 <sup>rd</sup> Annual Technical Training Seminar	September 2013 8 hours 24 hours
<u>Federal Bureau of Investigation Laboratory Division Explosives Unit</u> Post-Blast Investigator's School	September 2014 40 hours
<u>FARO</u> FARO Reality CSI for Crime Scene Reconstruction	February 2015 12 hours
<u>Paul Rimmasch</u> Fundamentals of Crime scene Photography	June 2015 40 hours
<u>University of Central Florida and National Center for Forensic Science</u> Basic Fire Debris Analysis	July 2015 2 CEUs
<u>Clandestine Laboratory Investigating Chemists Association</u> Improvised Explosives and Methamphetamine One-Pot Remediation Workshop 25 <sup>th</sup> Annual Technical Training Seminar	September 2013 8 hours 24 hours
<u>University of Central Florida and National Center for Forensic Science</u> Advanced Fire Debris Analysis	May 2016 2 CEUs
<u>Clandestine Laboratory Investigating Chemists Association</u> Sharpening the Saw: Refreshing Knowledge in Clan Lab Investigations and Basic Chemistry Concepts Workshop 26 <sup>th</sup> Annual Technical Training Seminar Presented: Root Cause Analysis and Mistake Proofing	September 2016  8 hours 24 hours
<u>Clandestine Laboratory Investigating Chemists Association</u> Considerations on Spectral Search Algorithms 27 <sup>th</sup> Annual Technical Training Seminar Presented: Validation of Analytical Procedures	September 2017 8 hours 24 hours

***PRESENTATIONS***

<u>Clandestine Laboratory Investigating Chemists Association</u> Root Cause Analysis and Mistake Proofing	September 2016
<u>Rocky Mountain Division of the International Association for Identification</u> Basic Digital Photography	June 2017
<u>Clandestine Laboratory Investigating Chemists Association</u> Validation of Analytical Procedures	September 2017

***EXPERT WITNESS TESTIMONY***

Wyoming Judicial Districts: First, Second, Third, Fourth, Fifth, Sixth, Seventh, Eighth and Ninth

US District Court: Wyoming District

Areas of expertise: Forensic Chemistry-analysis of controlled substances and clandestine laboratory evidence

***PROFESSIONAL ORGANIZATIONS***

Clandestine Laboratory Investigating Chemists (CLIC)

Member Since 2006

Position: Executive Board Member at Large

2016-current

***CERTIFICATIONS***

Diplomat of the American Board of Criminalistics-General Criminalistics

Dec 2006-Sept 2009

Fellow of the American Board of Criminalistics-General Criminalistics

Sept 2009-current

Wyoming Peace Officers Standards and Training Commission (POST)

Feb 2007-current

Practitioner Lecturer-Crime Scene Management

ASCLD/LAB Certified Technical Assessor

March 2010-current

## EXHIBIT 5

### STATEMENT OF QUALIFICATIONS

Jessica Bridges, Special Agent,  
Bureau of Alcohol, Tobacco, Firearms and Explosives  
Cheyenne, Wyoming.

I, Jessica Bridges, hereby declare and state:

1. That I am employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), and have been so employed since November 2015. As a Special Agent with ATF, one of my responsibilities is conducting criminal investigations concerning alleged violations of the Federal firearms laws. I have acquired knowledge and experience as to firearms and ammunition and the interstate nexus of firearms and ammunition, due to investigations, research, records, familiarity, conferring with other experts, training, and certifications. I prepare reports and official correspondence relating to the identification, origin, and classification of firearms and ammunition under the provisions of the Federal firearms laws.
2. That during the course of my duties, I have examined a multitude of firearms and rounds of ammunition for the purpose of determining the manufacturer, model, caliber/gauge, and serial number; the place of manufacture; function and design, and/or status as related to the National Firearms Act.
3. That I have contacted the ATF National Tracing Center on numerous occasions and requested firearms traces concerning the manufacture and interstate/intrastate shipment of firearms. I have also assisted numerous Federal, state and local law enforcement agencies with firearm traces.
4. That I have had numerous contacts with firearms dealers and manufacturers who are Federal firearms licensees, regarding licensing application, firearms transfer, acquisition, disposition, and compliance, and criminal enforcement matters.
5. That I have a Bachelor of Arts Degree in Psychology from the University of Maryland, Baltimore County and have completed courses in Criminology and Penology.
6. That I have received formal training for law enforcement personnel in both a general and specific nature as it pertains to the recognition and identification of firearms and ammunition and their place of manufacture. This training includes, but is not limited to the following:

State Police Academy, Department of Public Safety and Correctional Services,  
Sykesville, Maryland  
Criminal Investigator School, Federal Law Enforcement Training Center, Glynco,  
Georgia

New Agent Training, ATF National Academy, Glynco, Georgia  
Firearms Interstate Nexus Training, ATF Seattle Field Division, Seattle, WA

7. That I maintain current information regarding a historical list of licensed U.S. and foreign manufacturers, importers, and distributors, as well as, common firearms proof marks utilized by numerous foreign countries.
8. That for over 10 years I have had a personal interest in the history, collection, nomenclature, and sporting and professional use of firearms and ammunition. I have also accumulated a personal reference library of firearms and ammunition related publications such as *Gun Trader's Guide*, *Gun Digest*, *Standard Catalog of Military Firearms*, *Blue Book of Gun Values*, *Blue Book of Antique American Firearms & Values*, and *Ammo Encyclopedia* in order to remain familiar with firearms and firearm trends.

  
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Jessica Bridges  
Special Agent

## EXHIBIT 6

Ryan Cox  
Special Agent / Team Leader  
Central Enforcement Team  
Division of Criminal Investigation

Ryan Cox, is currently employed as a professional peace officer with the Wyoming Division of Criminal Investigation (DCI), Central Enforcement Team.

Special Agent Team Leader (TL) Cox has been a Law Enforcement Officer since 1994. TL Cox has been employed as a peace officer in South Dakota and Wyoming. He was employed by the Wyoming DCI since 2005, was assigned as a Drug Enforcement Administration (DEA) Task Force Officer in 2012, and promoted to Special Agent Team Leader (TL) Supervisor of the Central Enforcement Team in 2015.

TL Cox has training specific in the field of drug investigations, including; the Drug Enforcement Administration's two week Narcotics Investigators Course, the Wyoming Division of Criminal Investigation one week Drug Investigation Course, the Drug Recognition Expert course, the Recognizing Drug Impaired Driving course, the methamphetamine on Interstate Highways course, the Clandestine Laboratory Safety course, and training obtained during the South Dakota Reserve Officer certification course, the South Dakota Peace Officer's certification course, the Wyoming Peace Officer's course, and the Wyoming methamphetamine awareness conferences. TL Cox is a member of the National Technical Investigators Association and in such capacity has attended training and taught instruction specific to drug related technological investigations. TL Cox has conducted instruction for civilians and law enforcement personnel on drug related subject matters.

### Education:

- 1991 - High School Diploma - Powell, Wyoming.
- 1995 - Bachelors degree in Human Services, emphasis on law enforcement. Minor in Business Administration. - Black Hills State University.
- 1996 - South Dakota Peace Officer's Basic Training.
- 2005 - Wyoming Peace Officer's Basic reciprocity.

### Employment:

- 1994 - 1995: Reserve Deputy, Lawrence County Sheriff, Deadwood, SD.
- 1994 - 1995: Dispatcher, Lawrence County.
- 1995 - 1995: Dispatcher, Spearfish Police Department.
- 1995 - 2001: Police Officer with Spearfish Police, Spearfish, SD.
- 1996 - 2001: Member of the Northern Hills Drug Task Force, SD.
- 1996 - 2001: Member of the Spearfish SRT, SD.
- 1999 - 2001: FTO for the Spearfish PD, SD.
- 2001 - 2005: Police Officer with Rapid City Police, Rapid City, SD.
- 2003 - 2005: FTO for the Rapid City PD, SD.
- 2003 - 2005: Member of the Rapid City Area Gang Task Force, SD.
- 2005 - Present: Special Agent with Wyoming DCI.
- 2012 - 2015: Drug Enforcement Administration Task Force Officer.

- 2015 - Present: DCI - CEET Team Leader.

Spearfish Police Officer Relevant Experience:

- Northern Hills Drug Task Force Officer.
- Training Officer.
- Policy Development.
- Special Response Team.

Rapid City Police Officer Relevant Experience:

- Training Officer/FTO.
- Dispatch Committee Advisor.
- Neighbor Hood Watch Liaison Officer.
- Shift Representative for Annual Meeting.
- Gang Task Force Officer.
- Relevant training received from RCPD:
  - Gang Resistance Training.
  - Quad State Gang Seminar.
  - DEA Basic 2 weeks.
  - Safe Streets.

Wyoming Division of Criminal Investigation Agent Relevant Experience.

- Drug Enforcement Administration Task Force Officer.
- Instructor: Using Technology in Investigations.
- Case Management System (CMS) and Investigations program Subject Matter advisor.
- CMS and INV Trainer.
- Cell phone forensics advisor.
- ADACS Program Advisor and Administrator.
- DCI Training Officer.
- Case Tracking Sheet Developer.
- Team Web Page Developer and Maintenance.
- WYLEADS Developer.
- Instructor at the annual DCI Basic Course.
- NATIA member and NATIA instructor.
- Technology Advisor.
- Co-Author of the Wyoming DCI Intercept manual.

Drug Investigations Training:

- Reserve Officer training, 1994
- SD Peace Officer training, 1996
- Drug impaired driver - 4 hours, 1/98
- Drug recognition expert – 16 hours, 1997
- DEA basic narcotic investigations – 76 hours, 2002
- Meth on I-80 – 8 hours, 2005
- Clandestine Lab safety course – 40 hours
- Drug/Meth awareness – 8 hours
- Meth & your community – 16 hours

- Clandestine lab re-certification – 8 hours
- DCI Drug investigations – 40 hours.
- DEA Major Case Investigations, 40 hours, 5/08.
- Clandestine lab re-certification, 8 hours, 7/08.
- Prescription Diversion Training, 7 hours, 10/08.
- RF Audio Wire Training, 4 hours, 11/08.
- Intercept of Secure Communications, 24 hours, 3/10.
- Legal Update WY-AG, 9/15
- Legal Update, WY-AG, 5/16
- Fentanyl and Opioid Video Training, 6/16
- Legal Update, WY-AG, 5/17

#### Investigation Training:

- Outlaw Motorcycle Gangs, 4 hours, 7/97.
- Interview and Interrogation, 40 hours, 10/99.
- Gang Resistance, 80 hours, 4/02.
- Quad State Gang Conference, 7/03.
- Death Investigations, 36 hours, 5/05
- Officer Involved Shooting Investigation, 20 hours, 11/06
- Advanced Homicide, 40 hours, 11/06
- Advanced Homicide, 40 hours, 12/07.
- Advanced Homicide, 40 hours, 11/08.
- Courtroom Testimony, 16 hours, 11/08.
- Officer Involved Shooting/Use of Force, 1 hour, 2/10.
- White Collar Financial Crimes , 16 hours, 6/12.
- ECD & In-Custody Death Investigations, 24 hours, 6/12.
- Why Teens Kill - Phil Chalmers, 7 hours, 5/13.
- Homicide Investigations, 32 hours, 9/15.
- WLEA Use of Force Update, 6/16

#### Digital Forensics Training and Experience:

- Member of the Nation Technical Investigator's Association.
- IP Video, sponsored by NATIA, 40 hours.
- Attended the 2007 NATIA National Conference - 48 hours .  
Picaxe micro controllers, audio and video installation, GPS tracking, convert video.
- Forensically analyzed 100+ cellular phones/data devices/computers
- Instructor for Using Technology in Investigation, Wyoming Division of Criminal Investigation – 2 hour block.
- TTI Joey Training, 4 hours, 11/08.
- Manage Mobile Forensics, 2 hours, 10/09.
- ISS Cell Phone Intelligence 8 hours 10/11 – Breck McDaniel.
- Geographic Information Available from Cell Phones 1/12 – Breck McDaniel.
- Cyber Investigation 101, 8 hours, 4/12.
- Cybercop 101, 24 hours, 4/12.
- Police Technical, Cell Phone Investigations, 16 hours, 10/12.
- NATIA, 40 hours, 7/13 Memphis. 2 hours Cellebrite. 8 hours Instructor of covert video and



audio.

- ADACS, 30 hours, 8/13.
- NATIA, 40 hours, San Diego, 7/14.
- RIMS, 12 hours, Cheyenne, 11/15.

Instructor hours:

- Drug Awareness Presentation, Rawlins, 8 hours, 3/06
- Division of Criminal Investigation Agent School, 8 hours, 8/07, Search Warrant preparation
- Division of Criminal Investigation Agent School, 2 hours, 8/07, Technology in Investigations.
- Drug Awareness Presentation, Casper, 3 hours, 4/08
- Drug Awareness Presentation, Casper, 3 hours, 6/08
- Drug Awareness Presentation, Casper, 2 hours, 6/08
- Division of Criminal Investigation Agent School, 3 hours, 8/08, Technology in Investigations.
- Drug Awareness Presentation, Lusk, 8 hours, 8/08.
- Drug Awareness Presentation, Casper College, 3 hours, 4/09
- Drug Awareness & Methamphetamine Labs, Casper, 2 hours, 6/09
- Casper Meth Conference, Confidential Informants, 2 hours, 1/10.
- DCI Case Management Instructor Certification, 28 hours, 9/09.
- DCI Case Management Training, Casper, 2 hours, 12/09.
- DCI Case Management Training, Cheyenne, 3 hours, 12/09.
- Drug Awareness Presentation, Casper College, 3 hours, 4/10
- Drug Awareness Presentation, Casper College, 3 hours, 4/11
- Casper College Drug Awareness, Casper, 3 hours, 4/12
- DCI Case Management Training, Cheyenne, 8 hours, 5/21/12.
- DCI Case Management Training, Cheyenne, 8 hours, 5/22/12.
- DCI Case Management Training, Sheridan, 8 hours, 7/12.
- Drug Awareness to Wyoming Independent Living Rehab, 1 hour, 7/12.
- Division of Criminal Investigation Agent School, 8 hours, 8/12, Search Warrant preparation.
- Casper College Drug Awareness, Casper, 3 hours, 4/13.
- DCI Case Management Training, Cheyenne, 5 hours, 5/13.
- Division of Criminal Investigation Agent School, 8 hours, 8/13, Search Warrant preparation.
- Casper College Drug Awareness, Casper, 3 hours, 4/14.
- Division of Criminal Investigation Agent School, 8 hours, 8/14, Search Warrant preparation.
- Drug and Gang Awareness training to DFS, 2 hours, 1/15.
- Casper College Drug Awareness, Casper, 3 hours, 4/15.
- Division of Criminal Investigation Agent School, 8 hours, 8/15, Search Warrant preparation.
- DCI RIMS Case Management System All Agents Training, Cheyenne, 2 hours, 5/16.
- Marijuana Trends at Casper Meth Conference, Two-2 hours blocks, 4/16.

Supervisor Relevant Experience and Training:

- FTO – San Jose Model.
- FTO – Reno Model.
- First Line Supervisor, 24 hours, 8/09.
- Narcotics Commanders Workshop, 20 hours, 12/09.
- Interim Team Leader - 2010.

- Stand-in Team Leader - 2015.
- President - Garden Creek Volleyball Club - 2014 to present.
- CEET Team Leader - 2015 to present.
- Leadership in Policing Organizations - 120 hours, summer 2017.

Expert Witness:

- Irvine Trial.
- McGarvey Trial.
- Yeley Trial – drug and phone forensics/records.
- Negrete/Serrato trial – 701 testimony.
- Abnormal State Preliminary Hearings.
- McNaughton Trial - 10/14.
- Harold Creighton Trial - 10/15.
- Corey Garriot Trial - 9/16.

Telephone Intercepts:

- Boxcar - Rawlins Connection and Riverton Searches and Interviews 2006.
- Sunset - Breeden/Ennis/Bernal 2010.
- Sin City/Hobby Shop - Harris/Negrete/Camacho/Taz/Riverton 2011.
- AbNormal - Fredericks/Lewis 2012.
- Johnny Bravo - Wade/NCDTF 2013.
- Family Ties - Montoya/SLC DEA 2014.
- Jackpot - Smouse/Barrera/Millard/Little Friend - 2015 (Sr. Advisor).
- Con Man (KAHN) - 2016
- MorbiD Sin - 2017 - 2018

Awards:

- Coler-Williams South Dakota Peace Officer's Outstanding Student.
- WY AG DCI Commendation for Negrete Case.
- WY AG DCI Commendations for the Coretez-Nieto Case.
- US DOJ Recognition for Johnny Bravo Case.
- US DOJ Recognition for Sin City Case.
- US DOJ Recognition for Cortez-Nieto.
- US DOJ Recognition for Op Family Ties.
- HIDTA Award in reference to the KAHN Investigation.
- White House Office of National Drug Control Policy Award in reference to the KAHN Investigation

Ryan Cox

Team Leader/Special Agent - Wyoming Division of Criminal Investigation

**EXHIBIT 7**

**STATEMENT OF QUALIFICATIONS**

Matthew Talley Wright, Special Agent,  
Bureau of Alcohol, Tobacco, Firearms and Explosives  
Cheyenne, Wyoming

I, Matthew Talley Wright, do hereby declare and state,

1. That I am employed as a Special Agent with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and have been so employed since 2013. As a Special Agent with ATF, one of my responsibilities is conducting criminal investigations concerning alleged violations of the Federal Firearms laws. I have acquired knowledge and experience as to firearms and ammunition through investigations, research, records, familiarity, conferring with other experts, training, teaching and certifications. I prepare reports and official correspondence relating to the identification, origin and classification of firearms and ammunition under the provisions of the Federal firearm laws.
2. That during the course of my duties, I have examined firearms and rounds of ammunition for the purpose of determining manufacturer, model, caliber/gauge, and serial number; the place of manufacture; function and design, and/or status as related to the National Firearm Act.
3. That I have contacted the National Tracing Center on numerous occasions and requested firearms traces concerning the manufacture and interstate/intrastate shipment of firearms. I have also assisted numerous Federal, State and local law enforcement agencies with firearms traces.
4. I was previously employed as an Industry Operations Investigator with ATF from 2012-2013. During that time I had numerous contacts with firearms dealers and manufacturers who are Federal firearms licensees/permittees, regarding licensing applications, firearms transfers, acquisition, disposition, and compliance, as well as criminal enforcement matters, and continue to do so as part of ATF's liaison with the firearms industry.
5. I served approximately three years as a platoon leader and operations officer with the US Army's 3<sup>rd</sup> Infantry Division achieving the rank of Captain before transferring to the US Army Reserve, where I served another four years. During my military service, I had extensive training on weapons assigned to my unit. These weapons include the M4 Rifle, the M240 Machine Gun, the M249 Squad Automatic Rifle; the M203, M320, and MK19 Grenade Launchers, the M110 Sniper Rifle, and the M9 Pistol.

6. That I have received formal training for law enforcement personnel in both a general and specific nature as it pertains to the recognition and identification of firearms and ammunition and their place of manufacture. This training includes, but is not limited to the following:

United States Army Reserve Officers' Training Course, Colorado State University, Fort Collins, Colorado

Military Police Officer Basic Course, Fort Leonard Wood, Missouri

Industry Operations Investigator Basic Course, ATF National Academy, Glynco, Georgia

Criminal Investigator Training Program, Federal Law Enforcement Training Center, Glynco, Georgia

Special Agent Basic Training, ATF National Academy, Glynco, Georgia

7. I am a graduate of the Firearms Interstate Nexus Training Course in Martinsburg, West Virginia. During this training, I personally examined the ATF Firearms and Ammunition Technology Branch's reference collection, which includes approximately 20,000 firearms.
8. That I maintain current information regarding a historical list of licensed U.S. and foreign manufacturers, importers, and distributors, as well as, common firearms proof marks utilized by numerous foreign countries.
9. That for over 10 years I have had a personal interest in the history, collection, nomenclature, and sporting and professional use of firearms and ammunition. I have also accumulated a personal reference library of firearms and ammunition related publications such as *Gun Trader's Guide*, *Gun Digest*, *Flayderman's Guide to Antique American Firearms*, *Blue Book of Gun Values*, *Guns and Ammo*, and *Recoil Magazine* in order to remain familiar with firearms and firearm trends.



Matthew T. Wright  
Special Agent

## OBJECTIVE

To be utilized by the United States Attorney's Office for purposes of Expert Testimony.

## EDUCATION

Chadron State College, Chadron, NE • Fall 2013 – Fall 2016

- Master of Science Organizational Management
  - Summa Cum Laude, With Distinction • Cumulative GPA: 4.0 / 4.0 scale

Studied Abroad, London, England • Spring 2009 and Spring 2011

- London Metropolitan Police, New Scotland Yard
- 6 Undergraduate and 6 Graduate Credits Earned

Chadron State College, Chadron, NE • Fall 2008 – Spring 2010

- Bachelor of Arts in Justice Studies Emphasizing in Law Enforcement
  - Summa Cum Laude, With Distinction • Cumulative GPA: 4.0 / 4.0 scale

Casper College, Casper, WY • Fall 2006 – Spring 2008

- Associate of Arts in Criminal Justice
  - Summa Cum Laude, With Distinction • Cumulative GPA: 4.0 / 4.0 scale
- Associate of Applied Science in Fire Science Technology
  - Summa Cum Laude, With Distinction • Cumulative GPA: 4.0 / 4.0 scale

## COMPUTER RELATED CERTIFICATIONS

- Teel Technologies Advanced Mobile Forensics FlasherBox – July 2017
- OS Triage and Paladine/Autopsy Preview Tools – July 2017
- ICAC Undercover Chat & Online Ads Investigations – July 2015
- Macintosh & Linux Forensics – July 2015
- Access Data Advanced Forensic Toolkit - May 2015
- AccessData (Forensic Toolkit) Windows Registry Course - April 2015
- ICAC BitTorrent Training Program - February 2015
- Basic Data Recovery & Acquisition (ICAC Cybercop 101) - September 2014
- Internet Crimes Against Children Investigative Techniques - September 2014
- Intermediate Data Recovery and Analysis (ICAC Cybercop 201) - October 2014
- AccessData (Forensic Toolkit) BootCamp - November 2014

## SPECIAL SKILLS & CERTIFICATIONS

- Wyoming Peace Officer - Professional Level
- Commercial Driver's License (Class B, Tanker & Air Brake Endorsements)
- PADI Advanced Public Safety / Rescue SCUBA Diver
- Wyoming Basic Emergency Care Technician (First Responder)
- Hazardous Materials Operations Level
- FEMA ICS 100, 200, 300, 400, 700, 800
- Pro Board Certified Firefighter 1, 2, and Origin and Cause Fire Investigator
- Response to Officer Involved Shooting & Critical Incidents – March 2016
- Denver Police Department Undercover Vice Operations – 2013
- Vantor Spear Surveillance and Source Development – 2013
- Wyoming DCI Basic – 2013
- Advanced Reid Interview and Interrogation – 2012
- RMHIDTA Drug ID and Symptomology – 2011
- PATC Cell Phone Technology Course – 2011

## **MEMBERSHIPS & ORGANIZATIONS**

- Alumni Association Casper College – Board Member Since 2014
- Member, Wyoming Peace Officers Association
- Member, Fraternal Order of Police
- Alumni Association Chadron State College

## **RELEVANT CONFERENCES**

- Attendee – Internet Crimes Against Children Conference, Atlanta, GA – 2015, 2017
- Attendee – Techno Security & Mobile Forensics World Conference, Myrtle Beach, SC - 2016
- Attendee – Wyoming Homicide Investigators Conference, Cheyenne, WY – 2015
- Attendee – Crimes Against Children Conference, Dallas, TX – 2014
- Presenter – American Society of Criminology Conference, Philadelphia, PA – 2009

## **ACCOMPLISHMENTS & HONORS**

- Wyoming Department of Corrections, Officer of the Quarter ~ 2016
- Casper Police Department, Officer of the Year – 2013
- Letter of Commendation – Aggravated ATM Burglary and Distribution – 2013
- Letter of Commendation – Fire Station 1 Burglary – 2012
- Supervisor Recognition for Investigation of Stolen Property and Controlled Substances, Ronnie Young – 2012
- Officer of the Quarter, Third Quarter – 2012
- Medal of Distinguished Service for the Rescue & Evacuation of Tenants from Gail Gardens Apt. Fire – 2011
- Supervisor Recognition for the Arrest of Zacharia Johnson – Drug Possession – 2011
- Supervisor Recognition for Pursuit and Apprehension of Escapee's – YCC Escape, Stolen Vehicle, and Possession of a Controlled Substance – 2011
- Letter of Commendation for Sexual Assault Case – 2010

## **RELATED EXPERIENCE**

### **Special Agent • Wyoming Attorney General Division of Criminal Investigation • February 2016 - Present**

- Responsible for conducting state and federal investigations related to technology-facilitated crimes. Responsible for conducting certified computer forensic examinations on computers, computer equipment, digital media, digital cameras, cellular phones, and all peripherals involved in Internet Crimes Against Children and Narcotics Trafficking. Furthermore this position involves serving arrest warrants, executing search warrants, and developing criminal cases for presentation before the courts at State and Federal venues. Additionally, I worked in this position as a Task Force Officer while employed with Casper PD from July 2015 until February 2016 when I became employed full time.

### **Police Officer / Problem Oriented Response Team (PORT) Officer/ Operations Support Team (OST) Detective • Casper Police Department • February 2010 – February 2016**

Tasked with investigating a wide range of misdemeanor and felony offenses. Specifically PORT/OST was tasked with investigating vice crimes (prostitution and pimping), serving arrest warrants, executing low-moderate risk search warrants, narcotics offenses, and on-going criminal issues within the community. PORT/OST also developed street level intelligence and assists CPD investigators and the DCI Task Force.